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Attorneys for Defendant

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

SCOTT REESE,

Plaintiff,

v.

KILOLO KIJAKAZI,
Commissioner of Social Security,

Defendant.

Case No.: 2:22-cv-01722-DJA

**UNOPPOSED MOTION FOR
EXTENSION OF TIME
(FIRST REQUEST)**

Defendant, Kilolo Kijakazi, Acting Commissioner of Social Security (Defendant) respectfully requests that the Court extend the time for Defendant to respond to Plaintiff's Motion for Reversal and/or Remand (Dkt. No. 19, filed on February 23, 2023), currently due on March 27, 2023, by 30 days, through and including April 26, 2023. Defendant further requests that all subsequent deadlines set forth in the Court's scheduling order (Dkt. No. 18) be extended accordingly.

This is Defendant's first request for an extension of time to file a response. Good cause exists for this extension. Defendant respectfully requests this additional time because counsel is currently in the process of determining if a settlement agreement is possible. If the case cannot be settled, then Defendant's counsel will proceed with filing Defendant's response to Plaintiff's Motion for Reversal

1 and/or Remand. This request is made in good faith and with no intention to unduly delay the
2 proceedings.

3 On March 23, 2023, counsel for Defendant conferred with Plaintiff's counsel, who has no
4 opposition to this motion.

5 It is therefore requested that Defendant be granted an extension of time to respond to Plaintiff's
6 Motion for Reversal and/or Remand, through and including April 26, 2023.

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8 Dated: March 23, 2023

Respectfully submitted,

9 JASON M. FRIERSON
10 United States Attorney

11 /s/ David Priddy
12 DAVID PRIDDY
13 Special Assistant United States Attorney

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15 IT IS SO ORDERED:

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17 UNITED STATES MAGISTRATE JUDGE

18 DATED: March 24, 2023
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CERTIFICATE OF SERVICE

I, the undersigned, am a citizen of the United States and am at least eighteen years of age. My business address is 6401 Security Boulevard, Baltimore, Maryland 21235. I am not a party to the above-entitled action. On the date set forth below, I caused service of **UNOPPOSED MOTION FOR EXTENSION OF TIME (FIRST REQUEST)** on the following parties by electronically filing the foregoing with the Clerk of the District Court using its ECF System, which provides electronic notice of the filing:

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Attorney for Plaintiff

Dated: March 23, 2023

/s/ David Priddy
DAVID PRIDDY
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